

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Applicants:	Montgomery C. McGraw, et al.	Examiner:	Anthony Edwards
Serial No.:	10/754,804	Group Art Unit:	2835
Filed:	January 8, 2004	Docket No.:	200600385-1
Title:	System and Method for Displaying Chassis Component Information		

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**APPEAL BRIEF UNDER 37 C.F.R. § 41.37**

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Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

This Appeal Brief is filed in response to the Final Office Action mailed December 19, 2008 and Notice of Appeal mailed March 26, 2009.

**AUTHORIZATION TO DEBIT ACCOUNT**

It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's deposit account no. 08-2025.

**I. REAL PARTY IN INTEREST**

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

## **II. RELATED APPEALS AND INTERFERENCES**

There are no known related appeals or interferences known to Appellant, Appellant's legal representative, or assignee that will directly affect or be directly affected by or have a bearing on the Appeal Board's decision in the pending appeal.

### **III. STATUS OF CLAIMS**

Claims 1 – 71 are pending in the application and stand finally rejected. The rejection of claims 1 – 71 is appealed.

#### **IV. STATUS OF AMENDMENTS**

No amendments were made after receipt of the Final Office Action. All amendments have been entered.

## **V. SUMMARY OF CLAIMED SUBJECT MATTER**

The following provides a concise explanation of the subject matter defined in each of the claims involved in the appeal, referring to the specification by page and line number and to the drawings by reference characters, as required by 37 C.F.R.

§ 41.37(c)(1)(v). Each element of the claims is identified by a corresponding reference to the specification and drawings where applicable. Note that the citation to passages in the specification and drawings for each claim element does not imply that the limitations from the specification and drawings should be read into the corresponding claim element or that these are the sole sources in the specification supporting the claim features.

### **Claim 1**

A system for displaying chassis component information, comprising:

a chassis (Figure 1, server blade chassis 30: page 7, line 4);

a plurality of server blades each coupled to the chassis (Figure 1, server blades 32-41: page 7, line 5); and

each server blade comprising a respective liquid crystal display (LCD) positioned upon the server blade, the respective LCD operable to display chassis component information (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

### **Claim 3**

The system of claim 2, wherein the server blade information comprises an IP address of the server blade (The information being displayed on the LCD includes an IP address and slot: p. 7, lines 26-28).

### **Claim 4**

The system of claim 2, wherein the server blade information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information (The information being displayed on the LCD includes an IP address and slot, rack or chassis identification or assignment information: p. 7, lines 26-29).

Claim 15

A system for displaying chassis component information, comprising:  
a chassis (Figure 1, server blade chassis 30: page 7, line 4);  
a plurality of server blades stacked in and coupled to the chassis (Figure 1, server blades 32-41: page 7, line 5);  
a housing enclosing the chassis and the plurality of server blades (Figure 1, the server blades 32-41 are enclosed within a housing 54: p. 9, lines 12-13);  
each of the plurality of server blades comprising a liquid crystal display (LCD) operable to display chassis component information (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

Claim 18

The system of claim 16, wherein the chassis component information comprises an IP address of the chassis management blade (The information being displayed on the LCD includes an IP address and slot: p. 7, lines 26-28).

Claim 19

The system of claim 16, wherein the chassis component information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information (The information being displayed on the LCD includes an IP address and slot, rack or chassis identification or assignment information: p. 7, lines 26-29).

Claim 26

A system for displaying chassis component information, comprising:  
a chassis (Figure 1, server blade chassis 30: page 7, line 4);  
a plurality of server blades each coupled to the chassis (Figure 1, server blades 32-41: page 7, line 5);

a housing enclosing the plurality of server blades and the chassis (Figure 1, the server blades 32-41 are enclosed within a housing 54: p. 9, lines 12-13); and

each server blade comprising a respective display device positioned upon the server blade, the respective display device operable to display network configuration information with respect to the server blade (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

#### Claim 27

The system of claim 26, wherein the network configuration information comprises an IP address of the server blade (The information being displayed on the LCD includes an IP address and slot: p. 7, lines 26-28).

#### Claim 30

A method for displaying chassis component information, comprising:  
providing a chassis (Figure 1, server blade chassis 30: page 7, line 4);  
coupling a plurality of server blades to the chassis (Figure 1, server blades 32-41: page 7, line 5); and  
displaying chassis component information on respective liquid crystal displays (LCDs) positioned upon each server blade (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

#### Claim 44

A method for displaying chassis component information, comprising:  
providing a chassis (Figure 1, server blade chassis 30: page 7, line 4);  
coupling a plurality of stacked server blades to the chassis (Figure 1, server blades 32-41: page 7, line 5); and  
displaying chassis component information on a liquid crystal display (LCD) positioned upon each of the plurality of server blades (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration



information: page 7, lines 21-30).

Claim 55

A method for displaying chassis component information, comprising:  
providing a chassis (Figure 1, server blade chassis 30: page 7, line 4);  
coupling a plurality of server blades to the chassis (Figure 1, server blades 32-41: page 7, line 5);  
enclosing the plurality of server blades and the chassis in a housing (Figure 1, the server blades 32-41 are enclosed within a housing 54: p. 9, lines 12-13); and  
displaying network configuration information on a respective display device positioned upon each server blade (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

Claim 59

A system for displaying server blade information, comprising a plurality of server blades (Figure 1, server blades 32-41: page 7, line 5) at least partially enclosed in box build (Figure 1, the server blades 32-41 are enclosed within a housing 54: p. 9, lines 12-13) with each server blade including a liquid crystal display (LCD) positioned upon the server blade, the LCD operable to display server blade information (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30).

Claim 60

The system of claim 59, wherein the server blade information comprises an IP address of the server blade (The information being displayed on the LCD includes an IP address and slot: p. 7, lines 26-28).

Claim 61

The system of claim 59, wherein the server blade information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack

assignment and IP address information (The information being displayed on the LCD includes an IP address and slot, rack or chassis identification or assignment information: p. 7, lines 26-29).

Claim 68

A system for displaying chassis component information, comprising:

a chassis (Figure 1, server blade chassis 30: page 7, line 4);

a plurality of server blades each coupled to a midplane of the chassis (Figure 1, server blades 32-41: page 7, line 5. Figure 2, the server blades are coupled to a midplane 58 of the chassis 30: p. 9, lines 24-26); and

each server blade comprising:

a respective liquid crystal display (LCD) positioned upon the server blade, the respective LCD operable to display (Each server blade 32-41 includes a respective liquid crystal display 50 operable to display network configuration information: page 7, lines 21-30):

an IP address of the server blade upon which the respective LCD is positioned (The LCD displays IP address and slot: p. 7, lines 26-28);

chassis component activity information in color to indicate a message (The LCD displays chassis identification or assignment information and includes backlighting of various colors: p. 7, lines 28-31);

temperature information of at least one chassis component (The LCD displays temperature: p. 11, line 22); and

voltage information of at least one chassis component (The LCD displays voltage: p. 11, line 22); and

at least one respective control key associated with the respective LCD, the at least one respective control key operable to provide setup control and power control of the server blade of the at least one respective control key (Control keys 52 control the information displayed on the LCDs and manage operation of the server blades: p. 8, lines 1-4.).

**VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

Claims 1-7, 12-19, 24, 25, 26-36, 40-48, 53-62, 66, and 67 are rejected under 35 USC § 103(a) as being unpatentable over USPN 4,384,368 (Rosenfeldt) in view of USPN 6,901,557 (Martinez).

Claims 8-11, 20-23, 37-39, 50-52, 63-65, and 68-71 are rejected under 35 USC § 103(a) as being unpatentable over USPN 4,384,368 (Rosenfeldt) in view of USPN 6,901,557 (Martinez) and US publication number 2002/0084994 (Hansen).

## **VII. ARGUMENT**

The rejection of claims 1 – 71 is improper, and Appellants respectfully request reversal of these rejections.

The claims do not stand or fall together. Instead, Appellants present separate arguments for various independent and dependent claims. Each of these arguments is separately argued below and presented with separate headings and sub-heading as required by 37 C.F.R. § 41.37(c)(1)(vii).

### **Claim Rejections: 35 USC § 103(a)**

Claims 1-7, 12-19, 24, 25, 26-36, 40-48, 53-62, 66, and 67 are rejected under 35 USC § 103(a) as being unpatentable over USPN 4,384,368 (Rosenfeldt) in view of USPN 6,901,557 (Martinez). These rejections are traversed.

### **Principles of Law: Claim Construction**

During examination of a patent application, pending claims are given their broadest reasonable construction consistent with the specification (see *In re Prater*, 415 F.2d 1393, 1404-05 (CCPA 1969); *In re Am. A cad. a/Sci.Tech Ctr.*, 367 F.3d 1359, 1364 (Fed. Cir. 2004)).

Although a patent applicant is entitled to be his or her own lexicographer of terms in a claim, in *ex parte* prosecution the lexicography must be within limits. *In re Carr*, 347 F.2d 578, 580 (CCPA 1965). The applicant must do so by placing such definitions in the specification with sufficient clarity to provide a person of ordinary skill in the art with clear and precise notice of the meaning that is to be construed. *See also In re Paulsen*, 30 F.3d 1475, 1480 (Fed. Cir. 1994) (although an inventor is free to define the specific terms used to describe the invention, this must be done with reasonable clarity, deliberateness, and precision; where an inventor chooses to give terms uncommon meanings, the inventor must set out any uncommon definition in some manner within the patent disclosure so as to give one of ordinary skill in the art notice of the change).

Principles of Law: Obviousness

The test for determining if a claim is rendered obvious by one or more references for purposes of a rejection under 35 U.S.C. § 103 is set forth in *KSR International Co. v. Teleflex Inc.*, 550 U.S. \_\_\_, 82 USPQ2d 1385 (2007):

Under § 103, the scope and content of the prior art are to be determined; differences between the prior art and the claims at issue are to be ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background the obviousness or nonobviousness of the subject matter is determined. Such secondary considerations as commercial success, long felt but unsolved needs, failure of others, etc., might be utilized to give light to the circumstances surrounding the origin of the subject matter sought to be patented. Quoting *Graham v. John Deere Co. of Kansas City*, 383 U.S. 1 (1966).

As set forth in MPEP 2143.03, to ascertain the differences between the prior art and the claims at issue, “[a]ll claim limitations must be considered” because “all words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385.

According to the Examination Guidelines for Determining Obviousness Under 35 U.S.C. 103 in view of *KSR International Co. v. Teleflex Inc.*, Federal Register, Vol. 72, No. 195, 57526, 57529 (October 10, 2007), once the *Graham* factual inquiries are resolved, there must be a determination of whether the claimed invention would have been obvious to one of ordinary skill in the art based on any one of the following proper rationales:

(A) Combining prior art elements according to known methods to yield predictable results; (B) Simple substitution of one known element for another to obtain predictable results; (C) Use of known technique to improve similar devices (methods, or products) in the same way; (D) Applying a known technique to a known device (method, or product) ready for improvement to yield predictable

results; (E) “Obvious to try”—choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success; (F) Known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations would have been predictable to one of ordinary skill in the art; (G) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention. *KSR International Co. v. Teleflex Inc.*, 550 U.S. \_\_\_, 82 USPQ2d 1385 (2007).

Furthermore, as set forth in *KSR International Co. v. Teleflex Inc.*, quoting from *In re Kahn*, 441 F.3d 977, 988 (CA Fed. 2006), “[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasonings with some rational underpinning to support the legal conclusion of obviousness.”

Therefore, if the above-identified criteria and rationales are not met, then the cited reference(s) fails to render obvious the claimed invention and, thus, the claimed invention is distinguishable over the cited reference(s).

#### Scope and Content of Art and Overview of Claims

As a precursor to the arguments, Appellants provide an overview of the claims and the primary references (Rosenfeldt and Martinez). This overview will assist in determining the scope and content of the prior art as required in *Graham* (see *Graham v. John Deere Co. of Kansas City*, 383 U.S. 1, 17-18 setting out an objective analysis for applying 103 rejections).

The claims are generally directed to a chassis that houses a plurality of stacked server blades. Each server blade has an LCD that displays chassis component information.

Rosenfeldt is directed to an insert that is part of a signal transmission system for physiological signals taken at a body of a patient from a sensor.

Martinez is directed to a computer system that is a single headless server. The server includes an LCD for error reporting.

#### Differences Between the Art and Claims

Each of the independent claims recites one or more elements that are not taught or suggested in Rosenfeldt in view of Martinez. These missing elements show that the differences between the combined teachings in the art and the recitations in the claims are great. As such, the pending claims are not a predictable variation of the art to one of ordinary skill in the art.

These differences are shown below and presented with separate headings for different claim groups.

#### Sub-Heading: Independent Claims 1, 15, 26, 30, 44, 55, and 59

Independent claim 1 is selected for discussion.

As one example, independent claim 1 recites a plurality of server blades coupled to a chassis. Figure 1 shows plural server blades 32 – 41 coupled to a chassis 30. Rosenfeldt in view of Martinez and Hansen does not teach or suggest these claim recitations.

As shown in Fig. 1, Rosenfeldt teaches a device housing 1 that includes four device inserts 15-18. **These device inserts are not server blades.** Rosenfeldt describes what these inserts are:

The inserts 15 through 18, thus, are a part of the signal transmission system for physiological signals which are taken at the body of a patient by means of suitable sensors. To this end, thus, the sensors (not illustrated) are positioned on the body of the patient and are coupled via a signal cable (likewise not illustrated) to the respective inserts 15 through 18. The inserts 15 through 18, to this end, exhibits sockets 19 through 22 for the corresponding plugs of the signal cable. (See Rosenfeldt column 2, lines 24-34).

Thus, Rosenfeldt does not teach or even suggest a plurality of server blades. Instead, Rosenfeldt teaches inserts that form a device for receiving sensed physiological signals from a human. Rosenfeldt has nothing whatsoever to do with “server blades” as this term is known to one of ordinary skill in the art.

As shown in Figs. 1 and 2, Martinez teaches a computer system 100 than can be a single headless server. This headless server includes a liquid crystal display 124 for error reporting (see Martinez at column 3, lines 2-6). Martinez teaches a single headless server, not a plurality of server blades coupled to a chassis.

The differences between the claims and the teachings in the art are great since the references fail to teach or suggest all of the claim elements. As such, the pending claims are not a predictable variation of the art to one of ordinary skill in the art.

For at least these reasons, the claims are allowable over the art of record.

As another example, independent claim 1 recites “each server blade comprising a respective liquid crystal display (LCD) positioned upon the server blade, the respective LCD operable to display chassis component information.” Rosenfeldt in view of Martinez does not teach or suggest these recitations.

Rosenfeldt teaches inserts that form a device for receiving sensed physiological signals from a human. Rosenfeldt has nothing whatsoever to do with “server blades” as this term is known to one of ordinary skill in the art. Further, Rosenfeldt shows that the device inserts include front surfaces with display elements 25 through 29. Rosenfeldt, however, never suggests that these display elements show information for the chassis.

As shown in Figs. 1 and 2, Martinez teaches a computer system 100 than can be a single headless server. This headless server includes a liquid crystal display 124 for error reporting (see Martinez at column 3, lines 2-6). Martinez teaches a single headless server, not a plurality of server blades coupled to a chassis.

The combination of Rosenfeldt in view of Martinez teaches a headless server that connects to a medical device instrument that senses physiological conditions in a human. The medical device instrument in Rosenfeldt would send sensed physiological conditions to the server in Martinez.

The combination of Rosenfeldt in view of Martinez fails to teach or suggest plural server blades with each server blade comprising a respective liquid crystal display (LCD)



positioned upon the server blade, the respective LCD operable to display chassis component information.

The differences between the claims and the teachings in the art are great since the references fail to teach or suggest all of the claim elements. As such, the pending claims are not a predictable variation of the art to one of ordinary skill in the art.

For at least these reasons, the claims are allowable over the art of record.

#### Response to Examiner Arguments

The Examiner argues that the teachings in Rosenfeldt are combinable with the teachings in Martinez “to improve the system of Rosenfeldt for the predictable result of updating the system with blade servers having an easy to read LCD display on each blade server in the computer” (see Final OA mailed 12/19/2008 at p. 3). Appellants respectfully disagree.

Essentially, the Examiner is attempting to combine a medical device instrument that senses physiological conditions in a human with a server to obviate a chassis with plural blade servers. These devices and associated terms (device inserts for a medical device, servers, and server blades) have very different meanings to one skilled in the art.

Servers are a specific type of computers that are designed to provide services to clients. As defined by online dictionary Webopedia, a server is “a computer or device on a network that manages network resources” (see [www.webopedia.com](http://www.webopedia.com)). Furthermore, Webopedia defines the term server blade as “a single circuit board populated with components such as processors, memory, and network connections that are usually found on multiple boards. Server blades are designed to slide into existing servers. Server blades are more cost efficient, smaller and consume less power than traditional box-based servers.”

The combination of the device inserts for a medical device with a headless server does not teach a chassis with plural server blades wherein each server blade has an LCD display. Neither Rosenfeldt nor Martinez teaches a chassis with plural server blades. In other words, it is not possible for the combination of Rosenfeldt nor Martinez to teach or even suggest a chassis with plural server blades when neither of these references teaches plural server blades. Martinez teaches a single headless server, and Rosenfeldt teaches

device inserts for a medical device used to sense physiological changes in humans (such a device is very different than what one skilled in the art knows as being a server or server blade).

Appellants are not asking the BPAI to read words into a claim. Instead, Appellants respectfully ask the BPAI to give the words in the claims their “plain meaning” in accordance with MPEP § 2111.01. Appellants acknowledge that claims must be given their broadest interpretation during patent examination. However, this interpretation must be a “**reasonable interpretation consistent with the specification**” (see MPEP 2111: emphasis added). Appellants’ specification repeatedly uses the term “server” and “server blades” in a manner consistent with the plain meaning of these terms.

#### Sub-Heading: Independent Claims 26 and 55

Independent claim 26 is selected for discussion.

As one example, independent claim 26 that each server blades has a display that is “operable to display network configuration information with respect to the server blade.” Rosenfeldt in view of Martinez and Hansen does not teach or suggest these claim recitations.

Martinez teaches a single headless server that “may include a small display, such as a small liquid crystal display (LCD), for error reporting. Rosenfeldt teaches inserts that form a device for receiving sensed physiological signals from a human. The combination of Rosenfeldt and Martinez teaches a single headless server with an LCD display that couples to a device that reads physiological signals from a human.

The combination of Rosenfeldt and Martinez fails to teach or even suggest a chassis with plural server blades wherein each server blade has display that displays network configuration information with respect to the server blades.

The differences between the claims and the teachings in the art are great since the references fail to teach or suggest all of the claim elements. As such, the pending claims are not a predictable variation of the art to one of ordinary skill in the art.

For at least these reasons, the claims are allowable over the art of record.

Factors/Rationale Do Not Support Obviousness

In determining obviousness, neither the particular motivation to make the claimed invention nor the problem the inventor is solving controls. The proper analysis is whether the claimed invention would have been obvious to one of ordinary skill in the art after consideration of all the facts. Further, although the Supreme Court in KSR cautioned against an overly rigid application of the teaching-suggestion-motivation (TSM) rationale, the Supreme Court recognized that TSM was one of a number of valid rationales that could be used to determine obviousness.

Applicants discuss examples of rationale or factors below to show that there is no finding of obviousness.

As a first factor, Applicants respectfully submit that no teaching or suggestion exists to make the combination because the references are directed to completely different inventions. Rosenfeldt (in US classification 455/602) is directed to inserts that form a device for receiving sensed physiological signals from a human. Rosenfeldt has nothing to do with server blades or headless servers. **By contrast, Martinez teaches a completely different and unrelated invention.** Martinez (in US classification 715/772) is directed to a single headless server that includes a liquid crystal display for error reporting. Martinez never states or even suggests using the headless server for connecting to sensors to receive physiological signals from a human. Further, Rosenfeldt never states or even suggests using his device that senses human physiological signals as a headless server.

As a second factor, Rosenfeldt and Martinez would have to be greatly modified to arrive at the claimed invention. Rosenfeldt is directed to a device that attaches to sensors. These sensors, in turn, attach to a human to measure physiological signals from the human. By stark contrast, Martinez teaches a headless server. Martinez does not discuss or even suggest how this headless server could somehow be adapted to couple to sensors connected to a human and then read physiological signals from the human. Further, the devices for sensing physiological signals from a human in Rosenfeldt could not be easily adapted to function as a server since these are completely different electrical devices.

As a third factor, the differences between the claims and the applied references are great. By way of example, each independent claim recites one or more claim elements

directed to a plurality of server blades. Some of the independent claims recite that the server blades are stacked and enclosed in a housing or box build. Rosenfeldt in view of Martinez and Hansen does not teach or suggest these claim elements.

As a fourth factor, the Examiner is performing an improper piecemeal construction that uses hindsight to arrive at the claim elements. In other words, the Examiner is picking and choosing unrelated and isolated sentences or teachings from Rosenfeldt and Martinez with hindsight of Applicants' invention to allegedly obviate the pending claims. One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988).

As a fifth factor, no reasonable expectation of success has been established for modifying Rosenfeldt with the teachings of Martinez to arrive at the recitations of the claims. Rosenfeldt expressly teaches a device that uses sensors to attach to a human and then reads physiological signals from the human. By contrast, Martinez teaches a headless server. No explanation, instructions, or direction is provided in either Rosenfeldt or Martinez for modifying a server to be a device that connects to sensors to sense physiological signals from a human. Furthermore, no explanation, instructions, or direction is provided in either Rosenfeldt or Martinez for a device modifying the device in Rosenfeldt (i.e., a device that connects to sensors to sense physiological signals from a human ) to function as a headless server.

As a sixth factor, Appellant argues that no teaching or suggestion exists to make the combination because the references are directed to solving completely different problems. The background in Rosenfeldt discusses advantages of constructing device inserts that are insulated with a synthetic material. By contrast, the background in Martinez discusses problems of prior headless servers not having a keyboard and/or monitor to respond to errors during a boot process.

These various factors show that elements in the claims are not obvious in view of the Rosenfeldt and Martinez.

Sub-Heading: Dependent Claims 3, 18, 27, and 60

Dependent claim 3 is selected for discussion.

Dependent claim 3 recites wherein the server blade information being displayed comprises IP address information of the server blade. The Examiner argues that claim 3 is inherent in Rosenfeldt in view of Martinez. Appellants respectfully disagree.

As stated in MPEP 2112 (no emphasis added), in “relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristics necessarily flows from the teachings of the applied prior art.”

The examiner cites the background in Rosenfeldt but this section discusses an insert with a jacket composed of highly insulating synthetic material. Clearly, this topic is not related to what chassis information is displayed on blade servers. Coupling a medical device or medical inserts to a headless server certainly does not necessarily mean that each display of plural server blades would display IP address information of the server blade. **Even if each server blade inherently had an IP address, no teaching exists that such information would be displayed on the actual server blade. Server blades did not previously display such information.**

Sub-Heading: Dependent Claims 4, 19, and 61

Dependent claim 4 is selected for discussion.

Dependent claim 4 recites wherein the server blade information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information. The Examiner argues that claim 4 is inherent in Rosenfeldt in view of Martinez. Appellants respectfully disagree.

As stated in MPEP 2112 (no emphasis added), in “relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristics necessarily flows from the teachings of the applied prior art.”

The examiner cites the background in Rosenfeldt but this section discusses an insert with a jacket composed of highly insulating synthetic material. Clearly, this topic is not related to what chassis information is displayed on blade servers. Coupling a medical

device or medical inserts to a headless server certainly does not necessarily mean that each display of plural server blades would display one of the group elements recited in claim 4. **Even if each server blade inherently had an IP address, no teaching exists that such information would be displayed on the actual server blade. Server blades did not previously display such information.**

**Claim Rejections: 35 USC § 103(a)**

Claims 8-11, 20-23, 37-39, 50-52, 63-65, and 68-71 are rejected under 35 USC § 103(a) as being unpatentable over USPN 4,384,368 (Rosenfeldt) in view of USPN 6,901,557 (Martinez) and US publication number 2002/0084994 (Hansen). These rejections are traversed.

Dependent claims 8-11, 20-23, 37-39, 50-52, 63-65 are allowable for at least the reasons given with respect to the respective independent claims.

Sub-Heading: Independent Claim 68

Independent claim 68 recites plural server blades with LCD displays. These LCD displays display the following four different elements:

- an IP address of the server blade upon which the respective LCD is positioned;
- chassis component activity information in color to indicate a message;
- temperature information of at least one chassis component; and
- voltage information of at least one chassis component

The examiner has failed to cite a location or provide an argument in Rosenfeldt in view of Martinez and Hansen where each of these four different elements is taught or suggested. **The examiner has failed to establish a prima facie case of obviousness.**

Appellants can find not teaching in Rosenfeldt in view of Martinez and Hansen that teaches server blades that display these four elements.

The differences between the claims and the teachings in the art are great since the references fail to teach or suggest all of the claim elements. As such, the pending claims are not a predictable variation of the art to one of ordinary skill in the art.

For at least these reasons, the claims are allowable over the art of record.

### **CONCLUSION**

In view of the above, Appellants respectfully request the Board of Appeals to reverse the Examiner's rejection of all pending claims.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. 832-236-5529. In addition, all correspondence should continue to be directed to the following address:

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Respectfully submitted,

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### **VIII. Claims Appendix**

1. A system for displaying chassis component information, comprising:
  - a chassis;
  - a plurality of server blades each coupled to the chassis; and
  - each server blade comprising a respective liquid crystal display (LCD) positioned upon the server blade, the respective LCD operable to display chassis component information.
2. The system of claim 1, wherein the chassis component information comprises server blade information of the server blade upon which the respective LCD is positioned.
3. The system of claim 2, wherein the server blade information comprises an IP address of the server blade.
4. The system of claim 2, wherein the server blade information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information.
5. The system of claim 1, wherein the respective LCD is operable to display chassis component information in color to indicate a message.
6. The system of claim 1, wherein the chassis component information comprises chassis component activity information.

7. The system of claim 1, wherein the chassis component information comprises at least one of temperature information and voltage information.

8. The system of claim 1, wherein each server blade further comprises at least one respective control key associated with the respective LCD, the at least one respective control key operable to provide operational control of at least one chassis component.

9. The system of claim 8, wherein the at least one chassis component comprises the server blade of the at least one respective control key.

10. The system of claim 8, wherein the operational control comprises setup control of the server blade of the at least one respective control key.

11. The system of claim 8, wherein the operational control comprises power control of the server blade of the at least one respective control key.

12. The system of claim 1, wherein each server blade further comprises a respective management processor operable to drive the respective LCD, the management processor being operationally distinct from a main processor of the server blade such that the main processor may be inactive during operation of the respective LCD.

13. The system of claim 1, wherein each server blade further comprises: a respective

video output operable to output the chassis component information to an external display;  
and a respective management processor operable to drive the respective video output, the  
respective management processor operationally distinct from a respective main processor  
of the server blade such that the respective main processor may be inactive during output  
of the chassis component information to the external display.

14. The system of claim 1, wherein the respective LCD comprises a viewing area of  
approximately 14 mm x 11 mm.

15. A system for displaying chassis component information, comprising:  
a chassis;  
a plurality of server blades stacked in and coupled to the chassis;  
a housing enclosing the chassis and the plurality of server blades;  
each of the plurality of server blades comprising a liquid crystal display (LCD)  
operable to display chassis component information.

16. The system of claim 15, wherein each of the plurality of server blades comprises a  
chassis management blade operable to manage switch fabric of the chassis.

17. The system of claim 16, wherein the chassis component information comprises  
chassis component activity information.

18. The system of claim 16, wherein the chassis component information comprises an IP

address of the chassis management blade.

19. The system of claim 16, wherein the chassis component information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information.

20. The system of claim 16, wherein the chassis management blade further comprises at least one control key associated with the LCD, the at least one control key operable to provide operational control of at least one chassis component.

21. The system of claim 20, wherein the operational control comprises setup control of at least one chassis component.

22. The system of claim 20, wherein the operational control comprises power control of at least one chassis component.

23. The system of claim 20, wherein the at least one chassis component comprises at least one chassis cooling fan.

24. The system of claim 16, wherein the chassis management blade further comprises a management processor operable to drive the LCD, the management processor being operationally distinct from a main processor of the chassis management blade such that the main processor may be inactive during operation of the LCD.

25. The system of claim 15, wherein each of the plurality of server blades comprises a network interface card.

26. A system for displaying chassis component information, comprising:

a chassis;

a plurality of server blades each coupled to the chassis;

a housing enclosing the plurality of server blades and the chassis; and

each server blade comprising a respective display device positioned upon the server blade, the respective display device operable to display network configuration information with respect to the server blade.

27. The system of claim 26, wherein the network configuration information comprises an IP address of the server blade.

28. The system of claim 26, wherein the respective display device comprises at least one light emitting diode (LED).

29. The system of claim 26, wherein the respective display device comprises a liquid crystal display (LCD).

30. A method for displaying chassis component information, comprising:

providing a chassis;

coupling a plurality of server blades to the chassis; and  
displaying chassis component information on respective liquid crystal displays (LCDs) positioned upon each server blade.

31. The method of claim 30, wherein displaying chassis component information comprises displaying server blade information of the server blades upon which the respective LCDs are positioned.

32. The method of claim 31, wherein displaying server blade information comprises displaying an IP address of the server blade.

33. The method of claim 31, wherein displaying server blade information comprises displaying at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information.

34. The method of claim 30, wherein displaying chassis component information comprises displaying chassis component information in color to indicate a message.

35. The method of claim 30, wherein displaying chassis component information comprises displaying chassis component activity information.

36. The method of claim 30, wherein displaying chassis component information comprises displaying at least one of temperature information and voltage information.

37. The method of claim 30, further comprising providing operational control of at least one chassis component with at least one respective control key of each server blade, the at least one respective control key associated with the respective LCD of the server blade.

38. The method of claim 37, wherein providing operational control of at least one chassis component comprises providing operational control of the server blade of the at least one respective control key.

39. The method of claim 37, wherein providing operational control of at least one chassis component comprises providing setup control of the server blade of the at least one respective control key.

40. The method of claim 37, wherein providing operational control of at least one chassis component comprises providing power control of the server blade of the at least one respective control key.

41. The method of claim 30, further comprising driving the respective LCDs with a respective management processor of each server blade, the management processor being operationally distinct from a main processor of the server blade such that the main processor may be inactive during operation of the respective LCD.

42. The method of claim 30, further comprising:

outputting to an external display the chassis component information with a respective video output of each server blade; and

driving the respective video output with a respective management processor of each server blade, the respective management processor operationally distinct from a respective main processor of the server blade such that the respective main processor may be inactive during output of the chassis component information to the external display.

43. The method of claim 30, wherein the respective LCD comprises a viewing area of approximately 14 mm x 11 mm.

44. A method for displaying chassis component information, comprising:

providing a chassis;

coupling a plurality of stacked server blades to the chassis; and

displaying chassis component information on a liquid crystal display (LCD)

positioned upon each of the plurality of server blades.

45. The method of claim 44, wherein displaying chassis component information on an LCD positioned upon each of the plurality of server blades comprises displaying chassis component information on an LCD positioned upon a chassis management blade operable to manage switch fabric of the chassis.

46. The method of claim 45, wherein displaying chassis component information comprises displaying chassis component activity information.



47. The method of claim 45, wherein displaying chassis component information comprises displaying an IP address of the chassis management blade.

48. The method of claim 45, wherein displaying chassis component information comprises displaying at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information.

49. The method of claim 45, further comprising providing operational control of at least one chassis component with at least one control key of the chassis management blade, the at least one control key associated with the LCD.

50. The method of claim 49, wherein providing operational control of at least one chassis component comprises providing setup control of at least one chassis component.

51. The method of claim 49, wherein providing operational control of at least one chassis component comprises providing power control of at least one chassis component.

52. The method of claim 49, wherein providing operational control of at least one chassis component comprises providing operational control of at least one chassis cooling fan.

53. The method of claim 45, further comprising driving the LCD with a management processor of the chassis management blade, the management processor being

operationally distinct from a main processor of the chassis management blade such that the main processor may be inactive during operation of the LCD.

54. The method of claim 44, wherein each of the plurality of server blades comprises a network interface card.

55. A method for displaying chassis component information, comprising:

- providing a chassis;
- coupling a plurality of server blades to the chassis;
- enclosing the plurality of server blades and the chassis in a housing; and
- displaying network configuration information on a respective display device positioned upon each server blade.

56. The method of claim 55, wherein displaying network configuration information comprises displaying an IP address of the server blade upon which the respective display device is positioned.

57. The method of claim 55, wherein displaying network configuration information on a respective display device comprises displaying network configuration information on at least one respective light emitting diode (LED).

58. The method of claim 55, wherein displaying network configuration information on a respective display device comprises displaying network configuration information on at

least one respective liquid crystal display (LCD).

59. A system for displaying server blade information, comprising a plurality of server blades at least partially enclosed in box build with each server blade including a liquid crystal display (LCD) positioned upon the server blade, the LCD operable to display server blade information.

60. The system of claim 59, wherein the server blade information comprises an IP address of the server blade.

61. The system of claim 59, wherein the server blade information comprises at least one selected from the group consisting of slot assignment, chassis assignment, rack assignment and IP address information.

62. The system of claim 59, wherein the server blade information comprises at least one of temperature information and voltage information.

63. The system of claim 59, wherein the server blade comprises at least one respective control key associated with the LCD, the at least one respective control key operable to provide operational control of the server blade.

64. The system of claim 63, wherein the operational control comprises setup control of the server blade.

65. The system of claim 63, wherein the operational control comprises power control of the server blade.

66. The system of claim 59, wherein the server blade further comprises a management processor operable to drive the LCD, the management processor being operationally distinct from a main processor of the server blade such that the main processor may be inactive during operation of the LCD.

67. The system of claim 59, wherein the LCD comprises a viewing area of approximately 14 mm x 11 mm.

68. A system for displaying chassis component information, comprising:

- a chassis;

- a plurality of server blades each coupled to a midplane of the chassis; and

- each server blade comprising:

- a respective liquid crystal display (LCD) positioned upon the server blade, the respective LCD operable to display:

- an IP address of the server blade upon which the respective LCD is positioned;

- chassis component activity information in color to indicate a message;

- temperature information of at least one chassis component; and

- voltage information of at least one chassis component; and

at least one respective control key associated with the respective LCD, the at least one respective control key operable to provide setup control and power control of the server blade of the at least one respective control key.

69. The system of claim 68, wherein each server blade further comprises a respective management processor operable to drive the respective LCD, the management processor being operationally distinct from a main processor of the server blade such that the main processor may be inactive during operation of the respective LCD.

70. The system of claim 68, wherein the respective LCD comprises a viewing area of approximately 14 mm x 11 mm.

71. The system of claim 68, further comprising:

a chassis management blade coupled to the midplane of the chassis;

the chassis management blade operable to manage switch fabric of the chassis;

and

the chassis management blade comprising:

an LCD positioned upon the chassis management blade, the LCD operable to display at least one selected from the group consisting of slot assignment, rack assignment, chassis assignment and IP address information; and

at least one control key associated with the LCD, the at least one control key operable to provide setup control and power control of at least one chassis component.

**IX. EVIDENCE APPENDIX**

None.

**X. RELATED PROCEEDINGS APPENDIX**

None.